



FILED

July 19 2023

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND  
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

QUINTON VAUGHN BAKER and  
MALACHI MICHAEL GEORGE,

Defendants.

Criminal No.

3:23-CR- 60

Violations:

18 U.S.C. § 371  
18 U.S.C. § 922(a)(1)(A)  
18 U.S.C. § 922(a)(6)  
18 U.S.C. § 923(a)  
18 U.S.C. § 932(b)(1)  
18 U.S.C. § 933(a)(1)  
18 U.S.C. § 933(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy)

1. From on or about August 1, 2021, to on or about March 14, 2023 in Mineral County, in the Northern District of West Virginia and elsewhere, the defendants **QUINTON VAUGHN BAKER** and **MALACHI MICHAEL GEORGE** unlawfully, knowingly and willfully did combine, conspire, confederate and agree together with each other and with other persons, to commit offenses against the United States, to wit, to purchase, possess, and transfer firearms to person prohibited from possessing firearms, in violation of the Gun Control Act, Title 18, United States Code, Sections 922(a)(6), 932, and 933.

### **MANNER & MEANS**

2. It was part of the conspiracy that defendant **QUINTON VAUGHN BAKER** would purchase firearms from Federal Firearms Licensees (“FFLs”) in Mineral County, West Virginia, as well as Cumberland, Maryland.

3. Defendant **QUINTON VAUGHN BAKER** would purchase firearms and complete the ATF Form 4473 averring that he was the true purchaser of the firearms.

4. After defendant **QUINTON VAUGHN BAKER** purchased and acquired firearms, he would transfer the firearms to defendant **MALACHI MICHAEL GEORGE**.

### **OVERT ACTS**

5. In furtherance of the conspiracy and to affect the objects of the conspiracy the following overt acts, among others, were committed in the Northern District of West Virginia and elsewhere:

- a. On or about August 28, 2021, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of two firearm receivers (considered to be firearms under federal law)—that is a Stag Arms-15 multi-caliber receiver bearing serial number W-0028591; and a Stag Arms Stag-15 multi-caliber receiver bearing serial number W-0028600—from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant

represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;

- b. On or about September 17, 2021, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Ruger LC9 9mm pistol bearing serial number 320-10523, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;
- c. On or about February 26, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of firearms, that is a Girsan MC285A 9mm pistol bearing serial number T6363-21AV02930; and a Glock 34 9mm pistol bearing serial number AFMW620, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing

in Maryland, and represented himself to be the actual purchaser when he was not;

- d. On or about March 13, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Jimenez J.A. Nine 9mm pistol bearing serial number 073712, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;
- e. On or about March 26, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of firearms, that is a Glock 21 .45 caliber ACP pistol bearing serial number LEP734; and a Canik TP95A 9mm pistol bearing serial number 20AP02326, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;
- f. On or about March 27, 2022, in Mineral County, in the Northern District of West Virginia,

the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of firearms, that is a Palmetto State Armory KS47G2 7.62x39 caliber rifle bearing serial number KSG2014821Z; and a Girsan MC28SAT 9mm pistol bearing serial number T6368-20AV13116, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;

- g. On or about March 28, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is Canik TP9DA 9mm pistol bearing serial number MIG-21BJ 13545, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;
- h. On or about April 2, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a

firearm, that is a Palmetto State Armory PA-15 .223 caliber rifle bearing serial number SCD163110, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;

- i. On or about April 3, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Cugir Draco 7.62x39 caliber rifle bearing serial number DB-1737-16, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;
- j. On or about April 6, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Bryco Jennings Nine 9mm pistol bearing serial number 1309116, from a

FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;

- k. On or about July 18, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Glock 22 .40 caliber pistol bearing serial number NRA0279, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;
- l. On or about September 30, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Glock 19 9mm pistol bearing serial number AGCR177, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL,

which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;

- m. On or about October 3, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of firearms, that is a Anderson Manufacturing AM-15 .300 blackout caliber rifle bearing serial number 18310600; and a Glock G42 .380 caliber ACP pistol bearing serial number AGXC292, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;
- n. On or about December 19, 2022, in Mineral County, the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Glock 19 9mm pistol bearing serial number BEHR700, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement



and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not;

- o. On or about December 19, 2022, in Mineral County, the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, did knowingly purchase a firearm, to wit: a Glock 19 9mm pistol bearing serial number BEHR700, in and otherwise affecting interstate or foreign commerce for, on behalf of, or at the request of demand of **MALACHI MICHAEL GEORGE**, knowing or having reasonable cause to believe that **MALACHI MICHAEL GEORGE** had previously been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year; or did conspire to do so;
- p. On or about December 19, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Glock 19 9mm pistol bearing serial number BEHR700 to **MALACHI MICHAEL GEORGE** in and otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by **MALACHI MICHAEL GEORGE** would constitute a felony, or did attempt or conspire to do so;
- q. On or about December 19, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **MALACHI MICHAEL GEORGE**, did receive from another person, in and otherwise affecting interstate or foreign commerce, a firearm, to wit: a Glock 19 9mm pistol bearing serial number BEHR700, knowing or having reasonable cause to believe that such receipt would constitute a felony, or did attempt or conspire to do so.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

(Engaging in the Business of Dealing Firearms Without a License)

From on or about August 1, 2021 to on or about March 10, 2023, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

**COUNT THREE**

(False Statements During Purchase of Firearms)

On or about the August 28, 2021, in Mineral County, in the Northern District of West Virginia, defendant **QUINTON VAUGHN BAKER**, in connection with the purchase of two firearms, a Stag Arms Stag-15 multi-caliber receiver bearing serial number W-0028591 and a Stag Arms Stag-15 multi-caliber receiver bearing serial number W-0028600, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT FOUR**

(False Statements During Purchase of a Firearm)

On or about September 17, 2021, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Ruger LC9 9mm pistol bearing serial number 320-10523, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT FIVE**

(False Statements During Purchase of Firearms)

On or about February 26, 2022, in Mineral County, the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of firearms, that is a Girsan MC285A 9mm pistol bearing serial number T6363-21AV02930 and a Glock 34 9mm pistol bearing serial number AFMW620, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT SIX**

(False Statements During Purchase of a Firearm)

On or about March 13, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Jimenez J.A. Nine 9mm pistol bearing serial number 073712, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT SEVEN**

(False Statements During Purchase of Firearms)

On or about March 26, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of firearms, that is a Glock 21 .45 caliber ACP pistol bearing serial number LEP734 and a Canik TP95A 9mm pistol bearing serial number 20AP02326, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).



**COUNT EIGHT**

(False Statements During Purchase of Firearms)

On or about March 27, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of firearms, that is a Palmetto State Armory KS47G2 7.62x39 caliber rifle bearing serial number KSG2014821Z and a Girsan MC28SAT 9mm pistol bearing serial number T6368-20AV13116, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT NINE**

(False Statements During Purchase of a Firearm)

On or about March 28, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is Canik TP9DA 9mm pistol bearing serial number MIG-21BJ 13545, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT TEN**

(False Statements During Purchase of a Firearm)

On or about April 2, 2022, in Mineral County, in the Northern District of West Virginia, the defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Palmetto State Armory PA-15 .223 caliber rifle bearing serial number SCD163110, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT ELEVEN**

(False Statements During Purchase of a Firearm)

On or about April 3, 2022, in Mineral County, in the Northern District of West Virginia, defendant **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Cugir Draco 7.62x39 caliber rifle bearing serial number DB-1737-16, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT TWELVE**

(False Statements During Purchase of a Firearm)

On or about April 6, 2022, in Mineral County, in the Northern District of West Virginia, defendant **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Bryco Jennings Nine 9mm pistol bearing serial number 1309116, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT THIRTEEN**

(False Statements During Purchase of a Firearm)

On or about July 18, 2022, in Mineral County, in the Northern District of West Virginia, defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Glock 22 .40 caliber pistol bearing serial number NRA0279, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT FOURTEEN**

(False Statements During Purchase of a Firearm)

On or about September 30, 2022, in Mineral County, in the Northern District of West Virginia, defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Glock 19 9mm pistol bearing serial number AGCR177, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT FIFTEEN**

(False Statements During Purchase of Firearms)

On or about October 3, 2022, in Mineral County, in the Northern District of West Virginia, defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of firearms, that is a Anderson Manufacturing AM-15 .300 blackout caliber rifle bearing serial number 18310600 and a Glock G42 .380 caliber ACP pistol bearing serial number AGXC292, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).



**COUNT SIXTEEN**

(False Statements During Purchase of a Firearm)

On or about December 19, 2022, in Mineral County, in the Northern District of West Virginia, defendant, **QUINTON VAUGHN BAKER**, in connection with the acquisition of a firearm, that is a Glock 19 9mm pistol bearing serial number BEHR700, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was residing in West Virginia while actually residing in Maryland, and represented himself to be the actual purchaser when he was not; all in violation of Title 18, United States Code, Section 922(a)(6).

**COUNT SEVENTEEN**

(Straw Purchasing of Firearm)

On or about December 19, 2022, in Mineral County, in the Northern District of West Virginia, defendant, **QUINTON VAUGHN BAKER**, did knowingly purchase a firearm, to wit: a Glock 19 9mm pistol bearing serial number BEHR700, in and otherwise affecting interstate and foreign commerce for, on behalf of, and at the request of demand of **MALACHI MICHAEL GEORGE**, knowing and having reasonable cause to believe that **MALACHI MICHAEL GEORGE** had previously been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year; and did conspire to do so and was an unlawful user of and addicted to any controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. § 802)), in violation of Title 18, United States Code, Section 932(b)(1).

**COUNT EIGHTEEN**

(Trafficking in Firearms)

On or about December 19, 2022, in Mineral County, in the Northern District of West Virginia, defendant, **QUINTON VAUGHN BAKER**, did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm, to wit: a Glock 19 9mm pistol bearing serial number BEHR700 to **MALACHI MICHAEL GEORGE** in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearm by **MALACHI MICHAEL GEORGE** would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(1).

**COUNT NINETEEN**

(Trafficking in Firearms)

On or about December 19, 2022, in Mineral County, in the Northern District of West Virginia, defendant, **MALACHI MICHAEL GEORGE**, did receive from another person, in and otherwise affecting interstate and foreign commerce, a firearm, to wit: a Glock 19 9mm pistol bearing serial number BEHR700, knowing and having reasonable cause to believe that such receipt would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(2).

**FORFEITURE ALLEGATION**

*Gun Control Act*

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in and used in any knowing violation of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(2), 932, and 933 including the following:

1. Stag Arms Stag-15 multi-caliber firearm receiver bearing serial number W-0028591;
2. Stag Arms Stag-15 multi-caliber firearm receiver bearing serial number W-0028600;
3. Ruger LC9 bearing serial number 320-10523;
4. Girsan MC285A bearing serial number T6363-21AV02930;
5. Glock 34 bearing serial number AFMW620;
6. Jimenez J.A. Nine bearing serial number 073712;
7. Glock 21 bearing serial number LEP734;
8. Canik TP95A bearing serial number 20AP02326;
9. Palmetto State Armory KS47G2 bearing serial number KSG201481Z;
10. Girsan MC28SAT bearing serial number T6368-20AV13116;
11. Palmetto State Armory PA-15 bearing serial number SCD163110;
12. Cugir Draco bearing serial number DB-1737-16;
13. Bryco Jennings Nine bearing serial number 1309116;
14. Glock 22 bearing serial number NRA0279;
15. Anderson Manufacturing AM-15 bearing serial number 18310600;

16. Glock 42 bearing serial number AGXC292;
17. Glock 19 bearing serial number BEHR700;
18. SCCY CPX-2 bearing serial number 883295;
19. Canik TP9DA bearing serial number MIG-21BJ 13545; and
20. Glock 19 bearing serial number AGCR177.

A True Bill,

/s/ \_\_\_\_\_  
Grand Jury Foreperson

/s/ \_\_\_\_\_  
WILLIAM IHLENFELD  
United States Attorney

Lara K. Omps-Botteicher  
Morgan McKee  
Assistant United States Attorneys